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Attorneys for Plaintiff David M. Greco, *individually and on behalf of others similarly situated*

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

**David M. Greco,
*individually and on behalf of others
similarly situated,***

Plaintiff,

vs.

**Gurbir S. Grewal,
*New Jersey Attorney General, et al.,***

Defendants.

Civil Action No. 3:19-cv-19145-BRM-TJB

Honorable Brian R. Martinotti, U.S.D.J.

Honorable Tonianne J. Bongiovanni, U.S.M.J.

**NOTICE OF CROSS-MOTION FOR AN ORDER GRANTING PARTIAL SUMMARY
JUDGMENT IN FAVOR OF PLAINTIFF AND ENTERING FINAL JUDGMENT
AWARDING NOMINAL DAMAGES, DECLARATORY RELIEF AND PERMANENT
INJUNCTIVE RELIEF**

**TO: Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey - Newark Vicinage
United States Court House
Newark, New Jersey 07102**

**Robert McGuire, Deputy Attorney General
Simone Frey, Deputy Attorney General
Bryan Lucas, Deputy Attorney General
Office of the New Jersey Attorney General
R.J. Hughes Justice Complex
Trenton, New Jersey 08625
Attorneys for Defendant Gurbir S. Grewal**

**Bryan Lucas, Deputy Attorney General
Office of the New Jersey Attorney General
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Trenton, New Jersey 08625
Attorney for Defendants Jared M. Maples and New Jersey Office of Homeland Security
and Preparedness**

**Howard L. Goldberg, Esq.
First Assistant County Counsel
Office of the Camden County Counsel
Courthouse - 14th Floor
520 Market Street
Camden, New Jersey 08102
Attorney for Camden County Prosecutor's Office, Jill S. Mayer and Nevan Soumails**

**Vincent P. Sarubbim Esq.
Daniel DeFiglio, Esq.
Archer & Greiner, P.C.
33 East Euclid Avenue
Haddonfield, New Jersey 08033
Attorneys for Defendants Gloucester Township Police Department, Bernard John
Dougherty, Nicholas C. Aumendo, Donald B. Gansky, William Daniel Rapp and
Brian Anthony Turchi**

SIR / MADAM:

PLEASE TAKE NOTICE that on a June 15, 2020 or such other time to be fixed by the Court that the undersigned, attorney for Plaintiff David M. Greco, will Cross-Move before the Court seeking an Order granting the following forms of relief:

- An Granting Partial Summary Judgment in Favor of Plaintiff and Entering Final

Judgment Awarding Nominal Damages, Declaratory Relief and Permanent Injunctive Relief; and and

PLEASE TAKE FURTHER NOTICE that at such time and place that the Plaintiff David M. Geco shall rely upon (1) Plaintiff's Statement of Uncontested Material Facts and (2) Memorandum of Law both submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

s/ Albert Rescinio

DATED: June 1, 2020

ALBERT J. RESCINIO, ESQ.
ATTORNEY FOR PLAINTIFF DAVID M. GRECO

PROOF OF SERVICE:

ALBERT J. RESCINIO, ESQ. hereby certifies as follows:

1. I am the attorney for the Plaintiff in the within matter.
2. On today's date I caused copies of the moving papers to be filed electronically with the Clerk of the District Court and served on all parties electronically as per *Rules of Court*.

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED THIS 1st DAY OF JUNE 2020.

s/ Albert Rescinio

DATED: June 1, 2020

ALBERT J. RESCINIO, ESQ.

